

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

UNITED STATES OF AMERICA,

vs.

DONALD J. TRUMP, *et al.*,

Defendants.

**Case No. 23-80101-CR
CANNON/REINHART**

**PRESIDENT TRUMP’S UNOPPOSED MOTION TO RESCHEDULE HEARING ON
CIPA § 4 MOTIONS**

President Donald J. Trump submits this unopposed motion respectfully requesting that the Court adjourn the February 15 and 16, 2024 hearing on CIPA § 4 motions due to a conflicting hearing in Manhattan Supreme Court in *People v. Trump*, Index No. 71543/2023 (N.Y. Sup. Ct. 2022) (the “New York case”) scheduled for February 15, 2024 at 10:00 a.m.¹

1. On November 10, 2023, this Court issued an order scheduling a hearing on CIPA § 4 motions for February 15 and 16, 2024. (Dkt. No. 214 at 9). As Your Honor is aware, on April 4, 2023, President Trump was indicted and arraigned in New York County on a 34-count indictment charging him with Falsifying Business Records in the First Degree, in violation of New York Penal Law § 175.10. On July 5, 2023, the Honorable Juan M. Merchan, the assigned Supreme Court Judge, scheduled a hearing on the now-fully-briefed omnibus motions, for February 15, 2023 at 10:00 a.m. Judge Merchan ordered President Trump and his counsel to appear, either virtually or in person, at this hearing. Although President Trump’s schedule could change, we anticipate that President Trump will be present in person for the February 15, 2024 hearing in New York.

¹ Attorneys for President Trump conferred with the Special Counsel’s Office, and on November 12, 2023 the Office confirmed that it does not oppose adjourning the Hearing to a date convenient for the Court. In addition, defendants Walt Nauta and Carlos de Oliveira do not oppose this Motion.

2. President Trump and counsel recognize the challenges associated with scheduling a two-day hearing given the Court's busy calendar and the conflicting dates of counsel and President Trump. Because President Trump's presence with counsel at the previously scheduled New York hearing is required—as well as the significance of both the New York hearing and the CIPA § 4 hearing—we respectfully request that the Court adjourn the CIPA § 4 hearing to dates that are convenient for the Court, either earlier in the week of February 12 or the prior week.² This will allow both President Trump and counsel to be present and participate at both hearings.

3. Counsel is available at the Court's direction if further information is required or if there are any questions regarding the relief requested herein.

Dated: November 13, 2023

Respectfully submitted,

/s/ Todd Blanche

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Counsel for President Donald J. Trump

² The Special Counsel's Office informed us they prefer dates earlier in the week of February 12, 2024.

CERTIFICATE OF SERVICE

I, Christopher M. Kise, certify that on November 13, 2023, I electronically filed the foregoing document with the Clerk of Court using CM/ECF.

/s/ Christopher M. Kise
Christopher M. Kise